

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**VINNY’S TOWING AND RECOVERY    \***

**Plaintiff,**

**\***

**Civil Case No.:**

**v.**

**\***

**KBI SOLUTIONS, LLC, *et al.*,**

**\***

**Defendants.**

**\***

**\*       \*       \*       \*       \*       \*       \*       \*       \*       \*       \*       \***

**DEFENDANT J.B. HUNT TRANSPORT, INC.’S NOTICE OF REMOVAL**

Defendant, J.B. Hunt Transport, Inc. (hereinafter “J.B. Hunt”), by and through its undersigned attorneys, Renee L. Bowen and Franklin & Prokopik, P.C., and pursuant to 28 U.S.C. §§ 1441, *et seq.* files this Notice of Removal and hereby removes this action from the Circuit Court for Baltimore County, Maryland to the United States District Court for the District of Maryland, stating as follows:

1. J.B. Hunt has been named as a Defendant, along with KBI Solutions, LLC (hereinafter “KBI”), in a suit filed in the Circuit Court for Baltimore County, Case No. C-03-C-23-004517. The suit was originally filed on November 13, 2023, and J.B. Hunt was served with process on March 18, 2024.

2. Plaintiff, Vinny’s Towing & Recovery, LLC (“Plaintiff”) is a limited liability company organized under the laws of the State of Maryland with its principal place of business located at 19530 Beaver Creek Road, Hagerstown, Maryland 21740. Upon information and belief, all Members of Plaintiff are residents of Maryland.

3. Defendant KBI is a limited liability company organized under the laws of Pennsylvania with its principal place of business located in Pennsylvania at 242 Snapdragon Way,

Rear Lot, Allentown, Pennsylvania 18104. Upon information and belief all Members of KBI are residents of the state of Pennsylvania.

4. Defendant J.B. Hunt is incorporated in Georgia and has its principal place of business in Arkansas.

5. Plaintiff has asserted contractual and quasi-contractual claims against Defendants in this action arising out of Plaintiff's towing and recovery of a commercial motor vehicle.

6. This action is one in which this Court has original jurisdiction pursuant to 28 U.S.C. §1332. J.B. Hunt seeks to remove this action to this Court under 28 U.S.C. §1441 and 28 U.S.C. §1446.

7. J.B. Hunt is entitled to removal pursuant to 28 U.S.C. § 1332(a)(1) as there is complete diversity of citizenship between Plaintiff and all Defendants and the amount in controversy exceeds the sum or value of seventy-five thousand dollars (\$75,000.00).

8. Pursuant to Local Rule 103.5, attached as Exhibits 1 - 11 are copies of the following documents previously filed in the action pending in the Circuit Court for Baltimore County: (1) Complaint; (2) Case Information Sheet; (3) Writ of Summons; (4) Request to Re-Issue; (5) Writ of Summons; (6) Affidavits of Service; (7) Answer; (8) Cross-Claim; (9) Defendant's Notice to the State Court of Removal; and (10) State Court Docket Sheet.

9. No other Defendant has been previously served with the Complaint.

WHEREFORE, Defendant J.B. Hunt removes the above-captioned action from the Circuit Court for Baltimore County, Maryland, to the United States District Court for the District of Maryland.

Respectfully submitted,

/s/ Renee L. Bowen  
Renee L. Bowen, Esq. (#19623)

FRANKLIN & PROKOPIK, P.C.  
Two North Charles Street, Suite 600  
Baltimore, Maryland, 21201  
Telephone: 410-752-8700  
Facsimile: 410-752-6868  
[rbowen@fandpnet.com](mailto:rbowen@fandpnet.com)  
*Attorney for Defendant*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 10<sup>th</sup> day of April 2024, a copy of the foregoing Notice of Removal was served via first class mail, postage prepaid, as well as e-mailed to:

**Donald E. Pallett**  
Parker & Pallett  
11450 Pulaski Highway  
White Marsh, Maryland 21162  
410-335-3800  
[donpallettlaw@gmail.com](mailto:donpallettlaw@gmail.com)  
*Counsel for Plaintiff*

The foregoing Notice of Removal was served via regular mail on:

KBI Solutions, LLC  
242 Snapdragon Way (Rear Lot)  
Allentown, PA 18104  
*Defendant*

\_\_\_\_\_  
/s/

Renee L. Bowen, Esq.